

Attachment B

AGREEMENT TO EXTEND THE FILING DEADLINE

1. The United States and the Claimants, Plaintiffs in the civil action, *Howard J. Miller, et al v Juarez Cartel*, Civil Action No 1:20-cv-132; United States District Court for the District of North Dakota, by and through their attorney, Michael Elsner at Motley Rice LLC, agree to extend the deadline for the United States to file civil forfeiture complaints on the assets discussed below.

2. The Claimants have filed approximately 700 claims in the nonjudicial civil forfeiture proceedings initiated by the Drug Enforcement Administration and Customs and Border Protection, to the properties identified in Exhibit A ("the properties"). The Claimants intend this Agreement to apply to all claims filed by the claimants, even if the property is omitted from Exhibit A.

3. The claims have been, or are in the process of being, referred to United States Attorneys Offices across the country.

4. Pursuant to 18 U.S.C. § 983(a)(3)(A) and (B), the United States has 90 days from its receipt of a claim in a nonjudicial forfeiture proceeding to initiate a judicial forfeiture proceeding against the properties.

5. The Claimants acknowledge that the deadlines for the United States to file a judicial forfeiture action against the properties begin to run on or about November 29, 2023.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the Claimants and the United States have agreed to extend the time within which the United States may file a judicial action for forfeiture against the properties to give the parties sufficient time to try to resolve these matters before the United States files or declines to file any such a judicial forfeiture action.

7. The Claimants knowingly, intelligently, and voluntarily give up any right they may have under 18 U.S.C. § 983(a)(3)(A)-(B) to require the United States to file a judicial forfeiture against the properties covered by this agreement on or before the deadline referenced in paragraphs 4-5 and any right that they may have to seek dismissal of any civil judicial complaint on the ground that it was not timely filed.

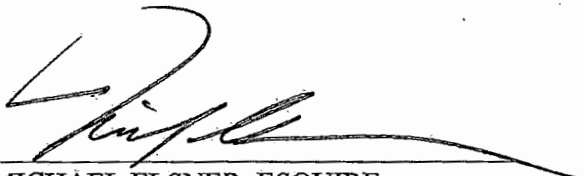
8. Claimants and the United States agree, that in the event the Claimants seek to file an amended claim, the United States will not argue that the amended claim is untimely during the course of the agreed upon extension.

9. Claimants' counsel warrants and represents that counsel is authorized to enter into this agreement on behalf of the Claimants.

10. The Claimants and the United States agree to extend the deadline by which the United States may timely file a judicial forfeiture against the properties until February 29, 2024. This extension is not intended to reduce the time in which the United States may file a judicial forfeiture against any of the properties (any property for which the statutory deadline is after February 29, 2024). In the event the February 29, 2024, deadline is not met, Claimants and the United States agree that the Claimants may assert any rights right they may have under 18 U.S.C. § 983(a)(3)(A)-(B) to require the United States to file a judicial forfeiture against the properties covered by this agreement.

ATTORNEY FOR CLAIMANTS

11/20/23
Date


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UNITED STATES OF AMERICA

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January 22, 2024

Date

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